

I strongly urge the FCC despite approving AT&T's bid for Qualcomm's unused wireless spectrum last December after rightly denying the T-Mobile merger (a consolation prize for AT&T) to deny the Verizon Wireless SpectrumCo and Cox applications for an AWS spectrum license transfer. During the proceeding (11-18) on AT&T Qualcomm spectrum transaction public interest groups had recommended as part of that transaction if approved the FCC should attach 700 MHz Interoperability rules and require AT&T to comply with interoperability if it gets that spectrum. Unfortunately, the FCC did not do so at that time but is now trying to address the issue with proceeding (11-69) in addition to considering whether to adopt service rules for holders of AWS spectrum (12-70) which I also strongly support. Verizon's proposed sale of its Lower 700 MHz A & B block spectrum if the SpectrumCo and Cox deals are approved – to ease regulatory concerns of spectrum concentration is an attempt to tempt the Commission to approve these deals but the FCC should reject them because of the massive spectrum concentration, interference problems with the spectrum Verizon proposes to sell for other carriers, threat to future 4G LTE interoperability if Verizon gets to offload 700 MHz spectrum and the threat of collusion presented in their joint operating entity agreements.